AO 106 (Rev. 04/10) Application for a Search Warrant

Approved: s/DanielGridley. Jr. 12-10-24

UNITED STATES DISTRICT COURT

Western District of Oklahoma

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12/	10/24

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a	Δ	PPLICATION FOR	A SEARCH WA	ARRANT					
I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under									
penalty of perj	deral law enforcement ury that I have reason arched and give its location	to believe that on the	for the governme following person	nt, request a search warrant and state to or property (identify the person or describe	unaer : the				
See Attachm	ent A.								
located in the	Western	District of	Oklahoma	, there is now concealed (identify	y the				
person or describ	e the property to be seized)	:							
See Attachm	ent B.								
<u>0</u> 0	esis for the search under devidence of a crime; contraband, fruits of property designed for a person to be arrest	crime, or other items or use, intended for us	illegally possesse	d; nitting a crime;					
The se	earch is related to a vio	lation of:							
	le Section C. § 841(a)(1)	Possession of a Co	<i>Offens</i> ontrolled Substand	e Description be with Intent to Distribute					
The ap	oplication is based on t	hese facts:							
See atta	ached Affidavit, which i	s incorporated by refe	erence herein.						
ø Co	ontinued on the attache	ed sheet.							
	elayed notice of der 18 U.S.C. § 3103a				sted				
			Jan	Applicant's signature					
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Sworn to before me and signed in my presence.

City and state: Oklahoma City, Oklahoma

Amanda Maxfield Green, United States Magistrate Judge

Samantha Knoll, United States Postal Inspector Printed name and title

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

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IN THE MATTER OF THE)		
SEARCH OF UNITED STATES)		
POSTAL SERVICE PRIORITY)		
MAIL PARCEL ORIGINATING IN)	M-24-	
LAKE BUENA VISTA, FLORIDA,)	Filed Under Se	
IDENTIFIED BY TRACKING)	rned Under Sc	eai
NUMBER 9405 5362 0624 9276 9319)		
57)		

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Samantha Knoll, being duly sworn, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS) and have been so employed since May 2012. I am currently assigned to the Philadelphia Division, and domiciled in Harrisburg, Pennsylvania. As part of my duties, I investigate criminal violations relating to controlled substances transported via the United States mails. As part of my duties, I investigate the use of the U.S. mails to illegally send and receive controlled substances, the proceeds of drug trafficking, as well as other instrumentalities associated with drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute controlled substances), and 843(b) (unlawful use of a communication facility, including the U.S. mails, to facilitate the distribution of controlled substances).

My training and experience include identifying parcels with characteristics indicative of criminal activity, completing an advanced contraband and interdiction training, and completing an online undercover operations training course. During the course of my employment with the USPIS, I have participated in hundreds of criminal investigations involving suspicious parcels and controlled substances.

2. This Affidavit is based upon the Affiant's personal investigation and upon information received from other law enforcement officers and agents and may not be inclusive of all evidence or information available or of all facts known to me relative to this investigation. Rather, I have included facts which are necessary to establish probable cause that the parcel described herein contains controlled substances. This affidavit is made in support of an application for a search warrant to search and seize contraband, fruits, instrumentalities, and evidence of crimes against the United States in violation of 21 U.S.C. § 841(a)(1) from a United States Postal Service (USPS) Priority Mail (envelope) parcel originating in the city of Lake Buena Vista, Florida. It is more specifically described as a sealed USPS Priority Mail parcel measuring approximately 12.5" x 9.5", identified by tracking number 9405 5362 0624 9276 9319 57, from Zip Code 32830, weighing approximately 0 pounds 3.28 ounces, label date November 18, 2024 (the "SUBJECT PARCEL"). The parcel's return address is Wyndham Vacation Ownership at "9560 Via Encinas LK Lake Buena Vista, Florida 32830". The SUBJECT PARCEL'S addressee is Steven Stewart at "PO Box 454 Stillwater, OK 74076-0454". The SUBJECT PARCEL is currently located at the United States Postal Inspection

Service Domicile in Oklahoma City, Oklahoma (6500 Air Cargo Road, Oklahoma City, Oklahoma: Western District of Oklahoma).

- 3. I am aware through training and experience, as well as information from other Postal Inspectors with extensive experience in drug trafficking investigations, that the United States Mail is a common and preferred method for drug traffickers to ship their product. United States Mail is frequently used by drug dealers for not only shipping illegal drugs, but also for shipping the proceeds and money from illegal drug sales and purchases. Use of the United States Mail is favored because of the speed, reliability, and low cost of this service, as well as the perceived minimal chance of detection of illegal drugs, money, or financial instruments shipped in such a manner.
- 4. I am also aware that drug traffickers often use fictitious return addresses and names on return addresses, as well as real names and real addresses (to include business names and addresses), with or without the actual person's knowledge or consent, to avoid detection in the event the parcel is intercepted by law enforcement officers. Parcels containing controlled substances often provide minimal information on the mailing label to avoid detection of a fictitious name or return address. Traffickers normally use heavy tape on the seams and corners of a parcel and have been known to use sealed containers and masking scents to interfere with any drug detection canine's ability to detect the drugs. It is common for traffickers to mail parcels from a different post office than the one located in the zip code area used on the return address, also to avoid detection of fictitious information. Traffickers also use prepaid postage which allows them to use

printed labels. The printed labels allow traffickers to not have to interact with an USPS employee by putting the parcel in a USPS collection box, the counter at a post office, or the parcel drop off location inside the post office. This provides traffickers with an additional layer of anonymity.

PROBABLE CAUSE

5. In and around February 2024, Pennsylvania State Police (PSP) responded to an address in York County, Pennsylvania for a report of an overdose death. In July 2024, USPIS joined the investigation. The victim's phone revealed that the victim obtained drugs online and received them via the U.S. Mails from Stillwater, Oklahoma. An individual of interest, Steven W. Stewart, was identified as someone who was distributing drugs via the U.S. Mails to the deceased victim. The victim's phone revealed that Stewart was utilizing a cloud-based social media messaging application, Telegram, under the username @s0urst3ve2023, to facilitate the sale and distribution of drugs. Stewart was using USPS to mail the drugs to his customers. Telegram is an international messaging application that allows users to send messages, photos, videos, and files of any type. It also features end-to-end encryption for voice calls and a secret chat option for more privacy. The application is known for its emphasis on privacy and security, offering features like self-destructing messages and the ability to create channels and groups with large member capacities. The investigation revealed Stewart's marketplace/channel on Telegram which listed the drugs he had for sale with prices.

- 6. USPS records revealed that Steven W. Stewart had post office box 454 at the Stillwater Post Office located at 809 S. Lewis Street Stillwater, OK 74074. Stewart used his Oklahoma driver's license as one form of identification when he opened the PO Box in February 2023. Some post offices allow post office box customers to receive mail at their PO Box by using the physical address of the post office along with their box number. Investigators discovered Stewart was living in a Recreational Vehicle (RV) at Country Horizon RV park in Ripley, Oklahoma.
- 7. On or about September 25, 2024, a Payne County Sheriff investigator conducted a trash pull from the community trash dumpster located at Country Horizon RV Park at 9212 West Main Street Ripley, Oklahoma. The Investigator located and seized a discarded Walmart trash bag containing miscellaneous trash and an opened USPS parcel. The USPS parcel was a Priority Mail padded envelope addressed to Steven Stewart 809 S Lewis St. #454 Stillwater, OK 74074 with return address of Azura Art LLC 131 W. Commonwealth Ave. Fullerton, CA 92832 (parcel #1). Parcel #1 contained an additional opened USPS parcel (parcel #2), a plastic tyvek style bag, pieces of plastic vacuum seal bags, and a money withdrawal slip with debit card ending in 4904 and account number ending in 1715 which the investigation previously identified as belonging to Stewart. Parcel #2 was a USPS Priority Mail flat rate envelope addressed to Steven Stewart 809 S. Lewis St. #454 Stillwater, OK 74074 with return address of MJ's Leather 500 Magnolia Ave. South San Francisco, CA 94080. According to USPS business records and an open-source search using www.google.com, the business listed

with the return address for parcel #1 did not associate to the address and weighed approximately .437 pounds. The business listed with the return address for parcel #2 associated to the address and weighed approximately .419 pounds. Parcels #1 and #2 were scanned "Delivered, Po Box" on September 19, 2024.

- 8. In September 2024, a PSP Trooper (Tpr.), acting in an undercover capacity (UC), began communications with the individual suspected to be Stewart on his social media, Telegram, account for the purpose of determine what drugs he had for sale and to purchase drugs from him. PSP conducted two undercover purchases of drugs from Stewart.
- 9. Between September 23, 2024, and October 1, 2024, PSP communicated with Stewart on his Telegram account and conducted a controlled purchase of the following drugs:
 - a. One bottle of Farmapram Alprazolam Tableta 2.0 mg 90 tabletas containing ninety white colored rectangular pills of suspected alprazolam.
 - b. One box labeled Viatris Xanax 0,50 mg Alprazolam 30 comprimes secables containing three blister packs of suspected alprazolam for a total of thirty pills.
 - c. One Sandoz Oxycodon 80 mg pill containing suspected oxycodone hydrochloride
 - d. One Oxydolor 80 mg pill containing suspected oxycodone hydrochloride
 - e. One Mundipharma Dicodin L.P. 60 mg pill containing suspected Dihydrocodeine
 - f. Two white colored pills containing suspected morphine

- g. Three grams of 3,4-Methylenedioxymethamphetamine (MDMA).
- 10. On or about September 26, 2024, the UC purchase parcel was mailed from the Stillwater Post Office and destined for an address in York, Pennsylvania provided to Stewart by the UC PSP Tpr. Stewart provided the tracking number of the parcel to the UC PSP Tpr. On or about October 1, 2024, USPIS opened the UC buy parcel and it contained the drugs ordered. The drugs seized from the UC purchase were sent to PSP lab for analysis and results are pending.
- 11. On or about October 8, 2024, a Payne County Sheriff investigator conducted a trash pull from the community trash dumpster located at Country Horizon RV Park at 9212 West Main Street Ripley, Oklahoma. The Investigator found opened USPS parcels addressed to Steven Stewart PO Box 454 Stillwater, Oklahoma 74076 and a silver bag. The silver bag appears consistent with what drug traffickers would use to conceal drugs as they seal items inside the bag requiring an individual to rip/tear it open. One USPS parcel (Parcel #1) was a Priority Mail medium flat rate box with a return address of New Generation 1189 Branham Ln. San Jose, CA 95118. One parcel was a Priority Mail flat rate envelope with a return address of Mystic Moon 28738 John R. Rd. Madison Heights, MI 48071 (parcel #2). According to USPS business records and an open-source search using www.google.com, the businesses listed with the return addresses for parcels #1 & #2 associates to the addresses and were scanned delivered on October 7, 2024. According to the open-source search, the business listed with parcel #2 is closed (no

longer in business). Parcel #1 weighed approximately 2.67 pounds and parcel #2 weighed approximately .269 pounds.

- 12. USPIS learned about a parcel from France addressed to Steven Stewart 809 S. Lewis #454 Stillwater, Oklahoma 74074 (Stewart's PO Box). The parcel was removed from the mailstream by USPIS and on or about October 10, 2024, USPIS obtained authority to open the parcel from a Homeland Security Special Agent pursuant to extended border search authority. Upon opening the parcel, USPIS discovered various drugs to include:
 - a. Two bottles of what appears to be cough syrup; one with codeine and one with dihyrocodeini hydrochloridum
 - b. Boxes of pills labeled Viatris Xanax 0,50mg Alprazolam
 - c. Boxes of pills labeled Phenergan Promethazine 25mg
- d. Boxes of pills labeled Dicodin L.P. 60mg, Tartrate de dihydrocodeine

 The drugs seized from the parcel were sent to PSP lab for analysis and results are pending.
- 13. On or about October 21, 2024, PSP began communicating with Stewart on his Telegram account and purchased the following drugs:
 - a. One 300mL bottle of codeine syrup
 - b. Twenty (20) pills of valium
 - c. Fourteen (14) grams of psilocybin mushrooms
 - d. Two (2) grams of ketamine

- e. Seven (7) grams of 3,4-Methylendeioxymethamphetamine (MDMA)
- On or about October 21, 2024, the UC purchase parcel was mailed by Stewart from the USPS Self-Serve Kiosk (SSK) in the Stillwater, Oklahoma Post Office. The parcel was destined to an address in York, Pennsylvania provided to Stewart by the UC PSP Tpr. A SSK is essentially a self-checkout machine where individuals can mail and purchase stamps directly from the machine and not have to interact with a USPS employee. The SSK accepts credit or debit card payment for purchases. Similar to an automated teller machine (ATM), the SSK takes photos during the transaction. The individual in the photos taken by the SSK during the mailing of the parcel appears to be consistent with Steven Stewart. Additionally, the card used to pay for the transaction was previous identified as belonging to Stewart. On or about October 25, 2024, USPIS opened the UC buy parcel and it contained the drugs ordered by the UC PSP Tpr. The drugs seized from the undercover purchase were sent to PSP lab for analysis and results are pending.
- 14. On or about November 19, 2024, the Payne County Sheriff's Office executed a search warrant on Stewart's residence (RV) and observed three lines of white powdery substance along with a rolled-up ten-dollar bill in plain view. It was determined the powder was an opioid. Investigators seized a variety of drugs to include various types of opioid and benzodiazepine pills, bottles of suspected syrup with codeine, and bags of crystalized powders. One type of pill found were white pressed alien pills which Stewart listed on his Telegram marketplace/channel as Lysergic Acid Diethylamide (LSD). One crystalized powder seized Stewart had listed on his Telegram as MDMA tested

presumptive positive for MDMA. Investigators also seized pounds of suspected THC products (flower, vape-style pens, and wax). Additionally, investigators found evidence of drug distribution to include blank USPS mailing products, scales, and baggies (plastic bags).

- 15. On or about November 22, 2024, Postal Inspectors located in Oklahoma City, Oklahoma received USPS Priority Mail parcel bearing tracking number 9205 5903 4701 6730 0037 5512 73 (Parcel 551273) from USPS. Parcel 551273 was addressed to Steven Stewart PO Box 454 Stillwater, OK 74076 from RPLG Logistics LLC 13111 Spring St. Baldwin Park, CA 91706-2286. On or about December 4, 2024, your affiant obtained a federal search warrant from an U.S. Magistrate Judge in the Western District of Oklahoma for Parcel 551273. Following the execution of the warrant on the parcel, Postal Inspectors discovered one sealed package of green leafy substance weighing approximately 266 grams with packaging, and one small sealed package of THC infused gummies concealed in layers of heat/vacuum sealed packaging (bags) and a tyvek style bag. The gummies' bag lists "100mg THC 5PCS 20mg EACH" and is labeled "Hydrotic Cannabis Infused Gummies" and had the government warning on it stating the package contains cannabis, a schedule I controlled substance.
- 16. On or about November 25, 2024, Postal Inspectors located in Oklahoma City, Oklahoma received the SUBJECT PARCEL from USPS. The individual listed with the delivery address associates to the address and is the primary suspect of the investigation. The business, "Wyndham Vacation Ownership" listed with the return address may not

associate to the address, as a variation of the business name does associate to the address. An open-source search using www.google.com for the return address reveals Club Wyndham Bonnet Creek hotel associates to the address. On or about December 5, 2024, your affiant called the Club Wyndham Bonnet Creek hotel, and a front desk employee stated the hotel does not mail anything to their customers using the name "Wyndham Vacation Ownership" and their address. Additionally, the employee stated the name "Wyndham Vacation Ownership" is a description and not an official title.

- 17. On November 27, 2024, a Postal Inspector based in Oklahoma City, OK met with Task Force Officer (TFO) J. Springer at the USPIS Oklahoma City Domicile. TFO Springer is also an Oklahoma City Police Department Detective/K9 Handler. TFO Springer and his K9 drug detection dog, "Dori," are both certified by the State of Oklahoma's Council on Law Enforcement Education and Training (License/Certificate Number 0090396-D004224). The SUBJECT PARCEL was presented before Dori and TFO J. Springer advised Dori did not alert on the SUBJECT PARCEL. Dori is trained and certified in the detection of marijuana, heroin, methamphetamine, and cocaine.
- 18. From my training and experience and the experience of other law enforcement officers, I know drug traffickers will purchase drugs in larger quantities than they sell. Traffickers package drugs in a way with the hopes of a drug detection canine not alerting on the parcel. Traffickers use tyvek style bags and heat and vacuum sealed plastic bags to reduce or stop the odor of the drug emitting from the parcel. The same type of bags were found during a trash pull conducted on September 25, 2024,

mentioned in paragraph seven and found inside Parcel 551273 mentioned in paragraph fifteen. Traffickers also use silver foil bags to conceal drugs as they must be ripped/torn open. The same type of bag was found during a trash pull conducted on about October 8, 2024, mentioned in paragraph eleven. Additionally, K9 Dori is not trained on all possible drugs and is only trained and certified on marijuana, heroin, methamphetamine, and cocaine. The investigation revealed, Stewart only sells one of those drugs (marijuana) and K9 Dori would not alert on the other drugs Stewart sells. The two controlled buys conducted by PSP mentioned in paragraphs 9-10 and 13 were drugs K9 Dori are not trained and certified on detecting. K9 Dori would only alert on one of the drugs (marijuana) seized from Stewart's residence (RV). Pills and powders can be packaged/shipped in a manner where the parcels would weigh less than two pounds and be smaller in size. Traffickers who sell drugs online tend to purchase (restock) their drugs from other online drug traffickers and receive drugs domestically (across the United States) and internationally (depending on type of drug) via parcel delivery services to include the U.S. Mails. Online traffickers who use online postage (pre-paid postage) will use business names and addresses or use a business address with a fictious business name and require their customers to use a real name and address to not draw attention to law enforcement officers and to deny culpability of a crime. The SUBJECT PARCEL's return address includes a business name and address with a variation of the business's name associating with the address. This package is similar to parcels found in the trash pulls conducted on September 25, 2024, and October 8, 2024, mentioned in paragraphs seven and eleven as the listed return address may associate to the listed return organization.

19. Your affiant believes SUBJECT PARCEL likely contains contraband drugs or other records relevant to Stewart's distribution activities based on the totality of the surrounding circumstances. Stewart has been involved in an ongoing business of the distribution of various pills and other controlled drugs in violation of federal law and shows a comfort level of receiving controlled drugs in his name at his Post Office Box. This SUBJECT PARCEL has indicators of this type of activity to include the return address uses a variation of the name of a business/association that associates to the address, which is a hotel. Additionally, an employee from the hotel stated the business name listed "Wyndham Vacation Ownership" is a description and not an official title and the hotel does not mail anything from the hotel to their customers/guests. The SUBJECT PARCEL originates from an area that is commonly a source location for the redistribution of various types of controlled substances.

AUTHORIZATION REQUESTS

20. Based on the foregoing, I believe there is evidence to show SUBJECT PARCEL, as described in paragraph two, was sent via the United States Postal Service in violation of 21 U.S.C. § 841(a)(1), and I respectfully request a warrant be issued authorizing the United States Postal Inspection Service to search and seize the parcel as described in Attachment A for the items described in Attachment B.

Samantha Knoll

United States Postal Inspector

United States Postal Inspection Service

Sworn and subscribed to before me this 10 day of December 2024.

AMANDA MAXFIELD GREEN United States Magistrate Judge

Western District of Oklahoma

ATTACHMENT "A"

SUBJECT PARCEL: a sealed USPS Priority Mail (envelope) parcel measuring approximately 12.5" x 9.5", identified by tracking number 9405 5362 0624 9276 9319 57, from Zip Code 32830, weighing approximately 0 pounds 3.28 ounces, label date November 18, 2024. The parcel's return address is Wyndham Vacation Ownership at "9560 Via Encinas LK Lake Buena Vista, FL 32830". The parcel's addressee is Steven Stewart at "PO Box 454 Stillwater, OK 74076-0454". The parcel is currently located at the United States Postal Inspection Service Domicile in Oklahoma City, Oklahoma (6500 Air Cargo Road, Oklahoma City, Oklahoma: Western District of Oklahoma).



ATTACHMENT "B"

- 1. Any controlled substances, as defined in 21 U.S.C. 812, as well as items of dominion or control inside the parcel;
- 2. The parcel's outer packaging;
- 3. Any correspondence, writings, including records and logs of monies owed, customer lists, sources of supply information to include drug shipments or accounts receivable in any medium such as written and/or electronic contained in the parcel;
- 4. Any financial instruments, including U.S. currency, contained in the parcel which relates to the sale, transfer, mailing, or distribution of controlled substances;
- 5. Any drug paraphernalia used to facilitate drug distribution; and
- 6. Any evidence constituting ownership and intent to possess controlled substances.